

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JACOB and JAMES JUNG, as  
Administrators of the Estate of LOUIS  
JUNG, JR,

Plaintiff,

v.

CITY OF PHILADELPHIA; YesCare Corp.;  
BLANCHE CARNEY, Former  
Commissioner of Philadelphia Dept. of  
Prisons; LALITHA TRIVIKRAM;  
MAUREEN GAY; MARIESHA APOLLON,  
BLAIR CABELLOS, GENA FRAISER,  
WANDA BLOODSAW

Defendants.

No. 2:24-cv-05618-TJS

**JURY TRIAL DEMANDED**

**CERTIFICATE OF MERIT**

I, Nia Holston, Esquire, certify that:

An appropriate licensed physician and expert in diabetes care, Louis Phillipson, M.D., Ph.D, has supplied a written statement to the undersigned that there is a basis to conclude that the care, skill or knowledge exercised or exhibited by defendant Blair Cabellos in the above-captioned action in the treatment, practice or work that is the subject of the complaint, fell outside acceptable professional standards and that such conduct was a cause in bringing about the harm.

Respectfully submitted,

/s/ Nia O. Holston  
Nia Holston  
PA I.D. No. 327384  
Abolitionist Law Center  
990 Spring Garden

Philadelphia, PA 19123  
267-357-0948  
[nia@alcenter.org](mailto:nia@alcenter.org)

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JACOB and JAMES JUNG, as  
Administrators of the Estate of LOUIS  
JUNG, JR,

Plaintiff,

v.

CITY OF PHILADELPHIA; YesCare Corp.;  
BLANCHE CARNEY, Former  
Commissioner of Philadelphia Dept. of  
Prisons; LALITHA TRIVIKRAM;  
MAUREEN GAY; MARIESHA APOLLON,  
BLAIR CABELLOS, GENA FRAISER,  
WANDA BLOODSAW

Defendants.

No. 2:24-cv-05618-TJS

**JURY TRIAL DEMANDED**

**CERTIFICATE OF SERVICE**

I, Nia O. Holston, hereby certify that I caused a true and correct copy of the foregoing Certificate of Merit to be electronically filed on this 8<sup>th</sup> day of May, 2025, and thereby served on all parties listed in the Court's ECF filing system.

Nia O. Holston

---